



Purple Communications, Inc.  
595 Menlo Drive  
Rocklin, CA 95765  
Tel 800 900 9478

December 20, 2016

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, D.C. 20554

**Re: Proposed VRS Rate Structure; CG Docket Nos. 10-51 & 03-123**

Dear Ms. Dortch:

Based on certain proprietary information, Purple Communications, Inc. (“Purple”) has developed a Video Relay Service (“VRS”) proposed rate structure, provided here, which Purple hopes will assist the Commission in establishing a VRS rate framework that reflects all providers’ costs and is appropriate for the VRS market. Purple and other providers made certain filings in connection with FCC meetings relating in part to the proposed rate structure that contain confidential commercial and financial information that is not customarily disclosed to the public and was properly withheld from public disclosure pursuant to Exemption 4 of the Freedom of Information Act.<sup>1,2</sup>

Nonetheless, in order to allow the Commission to develop a full and open record regarding VRS rates and expediently advance future VRS rate reform efforts, and in response to Sorenson Communications, LLC’s letter dated December 13, 2016,<sup>3</sup> Purple is submitting into the public record its proposed rate structure, which is below.

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<sup>1</sup> See Purple *et al.* Notice of Ex Parte, CG Docket Nos. 10-51 & 03-123 (Oct. 24, 2016); Purple Notice of Ex Parte, CG Docket Nos. 10-51 & 03-123 (Nov. 3, 2016); Purple *et al.* Notice of Ex Parte, CG Docket Nos. 10-51 & 03-123 (Nov. 17, 2016).

<sup>2</sup> See 5 U.S.C. § 552(b)(4).

<sup>3</sup> Through counsel, Sorenson has agreed to rescind its letter of December 13, 2016 in exchange for Purple’s submitting the proposed rate structure into the public record.



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Proposed Rate Structure		
<u>Proposed Tiers</u>	<u>Minutes</u>	<u>Rate</u>
Interim Emergent Rate*	0 - 500,000	\$ 5.06
Tier 1	0 - 1,000,000	\$ 4.82
Tier 2	1,000,001 - 2,500,000	\$ 4.35
Tier 3**	> 2,500,000	\$ 2.82

*\* Only applicable to the current Tier 1 Providers*

*\*\* Based on 2015 Industry Weighted Avg. Cost per minute*

Respectfully submitted,

/s/ Michael Strecker

Michael Strecker

Vice President Regulatory and Strategic Policy

Purple Communications, Inc.

cc: Eliot Greenwald